

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JACQUELYN CHIAO, CHRISTINE KIM,)	
ADRIANA PARVANOV and DANIELLE)	
SIMMONS,)	
)	Case No. 1:25-cv-00687-ELH
Plaintiffs,)	
)	Hon. Ellen Lipton Hollander
v.)	
)	
UNITED AIRLINES, INC., a Delaware)	
Corporation,)	
)	
Defendant.)	
_____)	

**DEFENDANT UNITED AIRLINES, INC.’S PARTIAL
MOTION TO DISMISS PLAINTIFFS’ FIRST AMENDED COMPLAINT**

Defendant, United Airlines, Inc., by its undersigned counsel, pursuant to Federal Rule of Civil Procedure 12(b)(6), hereby moves to dismiss Count II for intentional infliction of emotional distress and Count III for negligence alleged in Plaintiffs’ First Amended Complaint for failure to state a claim upon which relief can be granted. For reasons set forth in the accompanying Memorandum of Law, the Motion should be Granted and Counts II and III of the First Amended Complaint brought by Plaintiffs Jacquelyn Chiao, Christine Kim, Adriana Parvanova, and Danielle Simmons should be dismissed with prejudice.

WHEREFORE, Defendant United Airlines, Inc. respectfully requests that this Court enter an Order dismissing Counts II and III of Plaintiffs’ First Amended Complaint.

Dated: July 10, 2025

/s/ Jol A. Silversmith
Jol A. Silversmith (Bar No. 31542)
Rachel S. Nevarez (*Pro Hac Vice* granted)
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CERTIFICATE OF SERVICE

The undersigned certifies that, on July 10, 2025, pursuant to Fed. R. Civ. P. 5, a true and correct copy of the foregoing Defendant United Airlines, Inc.'s Partial Motion to Dismiss Plaintiffs' First Amended Complaint, Memorandum of Law, and Proposed Order was filed with the Clerk of Court using the CM/ECF System, which will send notification of such filing to all counsel of record at the email addresses on file with the Court.

/s/ Jol S. Silversmith
Jol A. Silversmith